

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

**INLAND ENVIRONMENTAL AND
REMEDiation, INC.**

Debtor,

§
§
§
§
§

CASE NO. 16-34624

(CHAPTER 11)

**JOINT MOTION FOR CONTINUANCE
OF PLAN CONFIRMATION HEARING**

**To the Honorable Jeff Bohm,
United States Bankruptcy Judge**

1. Inland Environmental and Remediation, Inc. (the "Debtor") filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code on September 14, 2016 (the "Date of Petition"). From and since the Date of Petition, the Debtor has maintained possession of its property, and has continued to remain in control of its ongoing business affairs as a Debtor-in-possession pursuant to the provisions of 11 U.S.C. §§ 1107 and 1108.

2. A hearing has been set by this Court for July 12, 2017 at 2:00 p.m. on the following:

Confirmation of Debtor's Chapter 11 Plan of Liquidation [Doc. #109]

Approval of Debtor's Disclosure Statement Under 11 U.S.C. § 1125 In Support of Chapter 11 Plan of Liquidation [Doc. #110]

3. As a result of continuing negotiations between the major parties in this case, this Motion for Continuance of the July 12, 2017 hearing is being filed jointly by the Debtor, Westchester Fire Insurance Company (the "Surety"), and the Railroad Commission of Texas (the "RRC"), and the parties request an extension of time to conduct the Confirmation Hearing and for

an extension of time for creditors to file objections to confirmation of the plan and for the parties to continue to negotiate a consensual plan, if possible.


4. The Debtor, Surety and RRC believe that it is in the best interest of the estate and the creditors to continue the confirmation hearing on the Debtor's plan and approval of the Debtor's disclosure statement.

5. Counsel for the Debtor has contacted Christine March, with the Office of the U.S. Trustee, Bennett Fisher, attorney for the Committee of Unsecured Creditors, Owen Sonik, attorney for Colorado County, and Jason Starks, attorney for the Texas State Comptroller, concerning the filing of this motion. Ms. March, Mr. Fisher, Mr. Sonik and Mr. Starks are unopposed to the filing of this motion. At the request of Ms. March, the Debtor shall be current with its Monthly Operating Reports within two (2) weeks. Further, the Debtor is current with its U.S. Trustee quarterly payments. Wherefore premises considered, the Debtor respectfully moves this Court to continue the hearing on the confirmation of the Debtor's Chapter 11 Plan and approval of the Debtor's Disclosure Statement; to extend the deadline for creditors to file objections to the Debtor's plan; and that the Court grant such other and further relief as the Debtor may be entitled.


Respectfully submitted,

/s/ Richard L. Fuqua

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CERTIFICATE OF CONFERENCE

I hereby certify that I contacted the following parties concerning the relief requested in the foregoing motion:

Christine March, with the Office of the U.S. Trustee;
Bennett Fisher, attorney for the Committee of Unsecured Creditors;
Own Sonik, attorney for Colorado County;
Jason Starks, attorney for the State Comptroller's Office

All of the above parties stated that they are unopposed to the relief requested in the foregoing motion.

/s/ Richard L. Fuqua
Richard L. Fuqua

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was upon all parties reflected on the attached service list via either electronic transmission, PACER/ECF or United States mail on the 24 day of July, 2017.

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